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Counsel for Defendant Don Andreas

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

LARA WARD, and individual,  
Plaintiff,

vs.

STATE OF NEVADA, ex rel. its BOARD OF  
MEDICAL EXAMINERS, DON ANDREAS, an  
individual, PAMELA CASTAGNOLA, an  
individual, KIM FRIEDMAN, an individual,  
KATI PAYTON, an individual, TODD RICH, an  
individual, EDWARD COUSINEAU, an  
individual, and DOES I - X,

Defendants.

CASE NO.: 2:17-cv-03029-JAD-NJK

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND THE TIME FOR  
DEFENDANT DON ANDREAS TO  
RESPOND TO THE COMPLAINT**

**(First Request)**

Defendant Don Andreas (“Defendant”) and Plaintiff Lara Ward (“Plaintiff”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. Defendant was served with the Summons and Complaint (ECF No. 1) in this case on January 10, 2018, and Defendant’s deadline to respond to the Complaint is January 31, 2018.

2. Prior to Defendant being served in this case, the other defendants, which were served earlier, filed a Motion to Dismiss (ECF No. 17), a Motion to Strike (ECF No. 18), and a Motion for a More Definite Statement (ECF No. 19). A hearing on those motions is scheduled for February 5, 2018 (ECF No. 21).

3. To avoid motion or pleading work by Defendant, which could be rendered moot by

1 the Court's decision at the hearing on February 5, 2018, Defendant, Plaintiff, and their respective  
2 counsel are in agreement that Defendant should have until 14 days after the Court's decision at the  
3 February 5, 2018 hearing or 14 days after Plaintiff files an amended complaint if the Court so  
4 allows, whichever is later, to respond to the Complaint or an amended complaint in this action.

5 4. This is the first request for an extension of this deadline. This stipulation is not  
6 made for the purposes of delay but is brought in good faith to promote efficiency avoid unnecessary  
7 cost.

8 Dated this 29th day of January, 2018

Dated this 29th day of January, 2018

9 GARG GOLDEN LAW FIRM

HKM EMPLOYMENT ATTORNEYS LLP

11 By /s/ Anthony B. Golden  
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By /s/ Jenny L. Foley  
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16 **ORDER**

17 IT IS SO ORDERED

19   
20 ~~UNITED STATES DISTRICT JUDGE~~  
UNITED STATES MAGISTRATE JUDGE

21 DATED: January 30, 2018